

The Honorable Robert J. Bryan

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

STATE OF WASHINGTON,

Plaintiff,

v.

THE GEO GROUP, INC.,

Defendant.

Case No. 3:17-cv-05806-RJB

**DECLARATION OF COLIN L. BARNACLE
IN SUPPORT OF DEFENDANT THE GEO
GROUP, INC.'S OPPOSITION TO
PLAINTIFF STATE OF WASHINGTON'S
MOTIONS IN LIMINE**

I, Colin L. Barnacle, make the following statement under oath subject to the penalty of perjury pursuant to the laws of the United States and the State of Washington:

1. I am the attorney for The GEO Group, Inc. in the above-captioned matter. I am over the age of eighteen (18), and I am competent to testify in this matter.

2. Attached are true and correct copies of the following exhibits:

EXHIBIT A: Attached as Exhibit A is the Complaint for Declaratory Judgment and Injunctive Relief filed in *United States of America v. Gavin Newsom, et al.*, S.D. Cal. Case No. 3:20-cv-00154-MMM-AHG.

EXHIBIT B: Attached as Exhibit B is the enacting legislation of the Washington Minimum Wage Act from 1961, Chapter 18, which was introduced by Senate Bill 30.

EXHIBIT C: Attached as Exhibit C is the enacting legislation of the Washington Minimum Wage Act from 1975, Chapter 289, which was introduced by Substitute House Bill 32.

1 **EXHIBIT D:** Attached as Exhibit D are emails between Sandy Mullins, Tammy Fellin,
2 Suchi Sharma, Lynne Buchannan, Elizabeth Smith and other individuals from Washington's
3 Department of Labor & Industries.

4 **EXHIBIT E:** Attached as Exhibit E are excerpts to the 30(b)(6) deposition of Joshua
5 Grice taken December 6, 2019.

6 **EXHIBIT F:** Attached as Exhibit F are excerpts to the 30(b)(6) deposition of Joshua
7 Grice taken September 5, 2019.

8 **EXHIBIT G:** Attached as Exhibit G are excerpts to the 30(b)(6) deposition of Colleen
9 Melody taken August 10, 2018.

10 **EXHIBIT H:** Attached as Exhibit H is a letter from Shannon Armstrong dated April 15,
11 2019.

12 **EXHIBIT I:** Attached as Exhibit I are excerpts from the 30(b)(6) deposition of Chuck
13 Hill taken July 10, 2019.

14 **EXHIBIT J:** Attached as Exhibit J is Exhibit 22 to the deposition of Fernando Aguirre-
15 Urbina taken June 11, 2018.

16 Dated this 23rd day of March, 2020 at Denver, Colorado.

17 Akerman, LLP

18 s/ Colin L. Barnacle

19 Colin L. Barnacle, (Admitted *pro hac vice*)
20 Attorney for Defendant The GEO Group, Inc.

PROOF OF SERVICE

I hereby certify on the 23rd day of March 2020, pursuant to Federal Rule of Civil Procedure 5(b), I electronically filed and served the foregoing **DECLARATION OF COLIN L. BARNACLE IN SUPPORT OF DEFENDANT THE GEO GROUP, INC.'S OPPOSITION TO PLAINTIFF STATE OF WASHINGTON'S MOTIONS IN LIMINE** via the Court's CM/ECF system on the following:

Marsha J. Chien
Andrea Brenneke
Lane Polozola
Patricio A. Marquez
OFFICE OF THE ATTORNEY GENERAL
800 Fifth Avenue, Suite 2000
Seattle, Washington 98104

Attorneys for Plaintiff

s/ Nick Mangels
Nick Mangels